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January 11, 2007

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Via HAND DELIVERY

The Honorable Vernon A. Williams Secretary Surface Transportation Board 1925 K Street, NW Washington, D.C. 20423

> Re: Simplified Standards for Rail Rate Cases, STB Ex Parte No. 646 (Sub-No. 1);

Notice of Intent to Participate

Dear Secretary Williams:

The Association of American Railroads ("AAR") hereby notifies the Board that it intends to participate in the January 31, 2007 public hearing in the above-captioned matter. Samuel M. Sipe, Jr., will appear on behalf of AAR and requests 10 minutes to address the Board.

Sincerely,

Samuel M. Sipe, Jr.

Counsel for the Association of

American Railroads

Parties of Record cc: